

From: [James McKenna](#)
To: [Kristine Koch/R10/USEPA/US@EPA](#); [Carl Stivers](#)
Cc: [Chip Humphrey/R10/USEPA/US@EPA](#); [Jennifer Woronets](#)
Subject: RE: Clarification on Proposed Resolutions to EPA Comments on the FS Tools
Date: 06/27/2011 08:59 AM

Thank you Kristine. We'll put the response table on the agenda for Exec approval this week. Jim.

-----Original Message-----

From: Koch.Kristine@epamail.epa.gov [mailto:Koch.Kristine@epamail.epa.gov]
Sent: Monday, June 27, 2011 8:57 AM
To: Carl Stivers
Cc: Humphrey.Chip@epamail.epa.gov; James McKenna; Jennifer Woronets
Subject: Re: Clarification on Proposed Resolutions to EPA Comments on the FS Tools

Carl - we agree with the proposed changes.

Thanks,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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From: Carl Stivers <cstivers@anchorqea.com>
To: Chip Humphrey/R10/USEPA/US@EPA, Kristine Koch/R10/USEPA/US@EPA
Cc: Jennifer Woronets <jworonets@anchorqea.com>, James McKenna <jim.mckenna@verdantllc.com>
Date: 06/23/2011 05:01 PM
Subject: Clarification on Proposed Resolutions to EPA Comments on the FS Tools

Chip and Kristine - It appears that LWG is in agreement with the final notations EPA provided on these comments/responses. However, we have one question before we can formalize this agreement within the LWG. We would suggest the following edit to one notation as follows:

Comment # 5 Mitigation Determination Approach: EPA agrees with the proposed resolution. The LWG acknowledges that there are no currently applicable mitigation banks or in-lieu fee programs that can be used to develop cost estimates. It is EPA's understanding that in-kind on-site mitigation estimates will be based on local mitigation projects and out-of-kind off-site will be based on examples from the Columbia River Basin or Puget Sound areas.

We believe EPA intended this terminology, which is consistent with the original comments, responses, and proposed resolutions on this subject.

If EPA can agree to this one edit, we can provide a final table with these notations as requested in your email. If we can get your input within the next few work days on the specific edit above, that will allow us to get this table through the LWG executive committee on June 29th and provide to you shortly thereafter, per your email.

Thanks much.

Carl

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-----Original Message-----

From: Humphrey.Chip@epamail.epa.gov [mailto:Humphrey.Chip@epamail.epa.gov]
Sent: Monday, June 20, 2011 5:02 PM
To: James McKenna; Bob Wyatt; Jennifer Woronets

Cc: Koch.Kristine@epamail.epa.gov
Subject: Proposed resolutions - LWG responses to EPA comments on FS Tools

Jim & Bob,

EPA has reviewed the LWG's June 10, 2011 email and June 9, 2011 table that provided the LWG's responses to EPA comments on the FS Tools memos and the proposed resolution of the comments. We agree that the Proposed Resolution column reflect the resolutions we agreed to during our conference calls on May 26 and 27 with the following notations:

Comment # 5 Mitigation Determination Approach: EPA agrees with the proposed resolution. The LWG acknowledges that there are no currently applicable mitigation banks or in-lieu fee programs that can be used to develop cost estimates. It is EPA's understanding that in-kind mitigation estimates will be based on local mitigation projects and out-of-kind will be based on examples from the Columbia River Basin or Puget Sound areas.

Comment # 11 EPA agrees with the proposed resolution with the clarification that the services will determine whether and what type of conservation measures are triggered by MNR remedies, and EPA will establish the appropriate requirements under our authority.

Comment # 19 EPA agrees with the first and last two sentences of the LWG's response, and notes the LWG's opinion as expressed in the rest of the response; but it is not relevant to costing approach for the draft FS.

Comment # 5 Costing Approach Memo - General - EPA generally agrees with the LWG's description of resolution with the understanding that the LWG's approach will be consistent with EPA guidance.

Comment # 6 Costing Approach Memo, Indirect construction - EPA generally agrees with the LWG's resolution with the understanding that the LWG's approach will be consistent with EPA guidance.

Comment #13 Costing Approach Memo, Capping - EPA's recollection is consistent with the LWG's description with one exception - the LWG would provide estimated costs (relative cost factors) for such monitoring similar to the resolution described in Comment #8 on MNR.

Please revise the June 9, 2011 table to incorporate the resolutions and submit the revised table to EPA. EPA expects that the LWG will address EPA's comments, including the proposed resolutions, in the draft FS or as otherwise indicated in the tables.

thanks,

Chip Humphrey
EPA
(503) 326-2678

Jim & Bob

This is to follow-up on our recent discussion at the Project Manager's meeting. EPA's proposed meeting objectives and information that should be provided prior to the June 22, 2011 FS Key Elements check-in meeting are attached. Also attached is some background and perspective on the process and additional information that our technical staff, consultants and partners have initially identified as critical to our understanding of the details of the alternatives screening and evaluations. This information is being provided as a starting point in planning the meeting, and to help frame our discussions as we finalize the agenda.

We look forward to working with the LWG to ensure that the meeting is productive and consistent with these objectives. Please let us know if you have any questions.

Chip

(See attached file: June 22 FS Key Elements Meeting Objectives and Information.pdf)

(See attached file: Background & Other Information for FS Check-in.pdf)